IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

CRAIG AND CAROL BALIUS **PLAINTIFFS**

VS. **CAUSE NO. 1:07CV674-LTS-RHW**

STATE FARM VP MANAGEMENT CORP.;
STATE FARM FIRE AND CASUALTY COMPANY;
STATE FARM GENERAL INSURANCE COMPANY;
ANY STATE FARM INSURANCE COMPANY
AFFILIATE; and JOHN DOES A-Z **DEFENDANTS**

PLAINTIFFS' DESIGNATION OF EXPERT WITNESSES

COMES NOW the Plaintiffs in the above-referenced cases, by and through undersigned counsel, and, pursuant to Uniform Local Rule 4.04 file this their Designation of Expert Witnesses and would identify the following individuals who may be called to testify as expert witnesses at the trial of this matter:

1. Mr. Rocco Calaci
   LRC Services
   236 Red Oak Lane
   Defuniak Springs, FL 32433
   (850) 830-3171

Rocco Calaci is an expert in the field of Meteorology. Mr. Calaci is expected to testify that the Balius home was destroyed by excessive winds and flying debris and that high water levels were not the cause. Please see Report attached as Exhibit "A".

His opinion will be based upon his education, experience, and background in the field of meteorology; his review of the subject property, relevant pleadings, depositions, discovery responses, the documents produced by the parties in this case, and other sources of weather data and information.

In that the Plaintiffs have not received any substantive responses to their discovery requests and no depositions have been taken, this expert's opinion may be supplemented. The Plaintiffs reserve the right to supplement, alter or amend this designation until discovery and/or investigation in this matter is complete.

Mr. Calaci's qualifications, education, experience, background and cases he has testified are accurately set forth in his Curriculum Vitae attached as Exhibit "B". This expert may utilize weather maps or charts, diagrams, summaries of statistical weather data and photographs in his direct testimony.

2. Craig Balius
c/o Lumpkin & Reeves
P. O. Drawer 1388
Biloxi, MS 39533
(228) 374-5151

Mr. Balius may provide fact and/or opinion evidence as a non-retained expert concerning damage estimates and related issues involved in this litigation, including, but not limited to, the extent of damage to the home. Mr. Balius acted as contractor to rebuild and replace furniture, fixtures, appliances, and other contents of the home. As such, he may express opinions regarding damage and replacement costs caused to his residence as a result of Hurricane Katrina. His opinions will be based upon his education, experience and hands-on contracting in rebuilding his residence. The exhibits to be used in support of his opinion include photographs, measurements, receipts, cancelled checks, inventories, and other similar materials. As a non-retained expert/fact witness, Mr. Balius did not prepare a report. However, Plaintiffs reserve the right to supplement if necessary. Mr. Balius has not been compensated for his analysis and testimony and he has not testified as an expert at trial or by deposition within the preceding four years.

3. Ted L. Biddy, P.E., PLS
2308 Clara Kee Blvd.
Tallahassee, FL 32303
(850) 536-0928

Mr. Biddy is designated as an expert witness in the fields of civil and forensic engineering and reconstruction costs. A copy of Mr. Biddy's C.V., list of trial and deposition testimony are attached hereto as Exhibit "C". Mr. Biddy is expected to give testimony regarding Hurricane Katrina's force and effect on Plaintiffs' dwelling, additional structures and property. Mr. Biddy is expected to testify concerning the impact that the severe winds of Hurricane Katrina had on the Plaintiffs' dwelling, structures and property before the property was contacted by Hurricane Katrina's water level. He is expected to offer testimony with regard to causation. He is also expected to testify regarding reconstruction costs. Please see Report attached hereto as Exhibit "D".

His opinions will be based upon his education, experience, and background in the field of civil and forensic engineer; his review of the subject property, relevant pleadings, depositions, discovery responses, the documents produced by the parties in this case, and other sources of weather data and information.

In that the Plaintiffs have not received any substantive responses to their discovery requests and no depositions have been taken, this expert's opinion may be supplemented. The Plaintiffs reserve the right to supplement, alter or amend this designation until discovery and/or investigation in this matter is complete.

4. Curtis Harrison
Charles Harrison Realty Agency
720 Jackson St.
Biloxi, MS 39530
(228) 436-6982

Mr. Harrison is designated as an expert appraiser. Mr. Harrison is expected to give testimony regarding the present value of Craig and Carol Balius' home. Mr. Harrison's C.V. and Appraisal will be supplemented.

His opinion will be based upon his education, experience, and background as an appraiser; his review of the subject property, relevant pleadings, depositions, discovery responses, and documents produced by any of the parties in this case.

In that the Plaintiffs have not received any substantive responses to their discovery requests and no depositions taken, this expert's opinion may be supplemented. The Plaintiffs reserve the right to supplement, alter or amend this designation until discovery and/or investigation in this matter is complete.

5. Leslee Campbell John
5332 Pontiac Street
Ocean Springs, MS 39564
(228) 432-2462

Ms. John is designated as an expert appraiser. Ms. John is expected to give testimony regarding the fair market value of said property immediately prior to the claimed casualty loss(es). See C.V. attached as Exhibit "E" and Appraisal attached as Exhibit "F".

Her opinion will be based upon her education, experience, and background as an appraiser; her review of the subject property, relevant pleadings, depositions, discovery responses, the documents produced by the parties in this case, and other sources of weather data and information.

In that the Plaintiffs have not received any substantive responses to their discovery requests and no depositions have been taken, this expert's opinion may be supplemented. The Plaintiffs reserve the right to supplement, alter or amend this designation until discovery and/or investigation in this matter is complete.

6. Jennifer Strojny Milligan
Strojny & Strojny Financial Service
2598 Pass Road
Biloxi, MS 39531
(628) 388-6596

Ms. Milligan is non-retained expert/fact witness. Ms. Milligan is expected to testify concerning the tax filings which relate to the subject property, specifically, the information sought in the Defendant's Second Set of Interrogatories, Interrogatory No. 22. See 2005 Income Tax Return attached as Exhbiit "G".

However, Plaintiffs reserve the right to supplement if necessary. Ms. Milligan has not been compensated for her analysis and testimony and she has not testified as an expert at trial or by deposition within the preceding four years.

Her opinion will be based upon her education, experience, and background in the fields of accounting.

In that the Plaintiffs have not received any substantive responses to their discovery requests and no depositions have been taken, this expert's opinion may be supplemented. The Plaintiffs reserve the right to supplement, alter or amend this designation until discovery and/or investigation in this matter is complete.

7. Other Experts

The Plaintiffs reserve the right to call any and all to call, utilize and designate experts to testify who may be designated by any other party. The Plaintiffs may also call expert witnesses in rebuttal to any experts called, by any other party, to testify at trial.

The Plaintiffs further reserve the right to supplement this Interrogatory response once appropriate depositions have been taken; and retain the right to not call any of the experts above.

RESPECTFULLY SUBMITTED, this the 14th day of March, 2008.

CRAIG AND CAROL BALIUS,
PLAINTIFFS

/s/ Mark D. Lumpkin

By: ______________________________

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the EFC system which sent notification of such filing to the following:

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This the 14th day of March, 2008.

/s/ Mark D. Lumpkin

MARK D. LUMPKIN